

129691

FAA-01-8994-27

Author: r&rclement@servcom.com at Internet

Date: 9/1/97 2:02 PM

Priority: Normal

TO: 9-NPRM-CMTS at ARM

Subject: NPRM-Certification Procedures for Changed Products

To whom it may concern:

28103

20

I am not in favor of the proposed change to the STC procedures for older aircraft as stated below. The FAA cites changes and requirements are needed because of changes in technology. Most changes made to older aircraft are for improvement and due to the tort and the FAA over bearing in the past few years, in general aviation most of the aircraft that we have these days are older aircraft.

If we are required to go through the bureaucratic hoops for of recertification for modifications as engine changes, panel modifications such as flight 2000 or other safety improvements. Safety will not be enhanced because people will not make the changes, due to the greater expense.

General Aviation and future of Aviation in this country is very grim. Please be very careful in making change just for the pupose of making change.

"This document proposes to amend the procedural regulations for the certification of changes to type certificated products. The amendments are need to address the trends toward fewer products that are of completely new design and more products with repeated changes of previously approved designs. Safety would be enhanced by applying the latest airworthiness standards, to the greatest extent practicable, for the certification of design changes of aircraft engines, and